

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MOUNTAIN EXPRESS OIL COMPANY, et al.,

Debtors.¹

Chapter 11

Case No. 23-90147 (DRJ)

(Joint Administration Requested)

NOTICE OF DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASE

On March 18, 2023 (the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed voluntary petitions for relief under Title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas. The undersigned proposed counsel for the Debtors believes that these chapter 11 cases qualify as complex chapter 11 cases because:

 X The Debtors have total debt of more than \$10 million;

 X There are more than 50 parties in interest in these chapter 11 cases;

 Claims against the Debtors are publicly traded;

 Other (Substantial explanation is required. Attach additional sheets if necessary).

The Debtors request entry of an order granting the relief requested herein and granting such other and further relief as the Court deems just and proper under the circumstances.

¹ A complete list of each of the Debtors in these Chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.kccllc.net/mountainexpressoil. The location of Debtor Mountain Express Oil Company’s principal place of business and the Debtors’ service address in these Chapter 11 cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

Dated: March 18, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Michael D. Warner

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Proposed Counsel to the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on March 18, 2023, a true and correct copy of the foregoing document was caused to be served by this Court's CM/ECF Filing System on parties that have registered to receive electronic service in the above cases.

/s/ Michael D. Warner

Michael D. Warner